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December 1, 2023

SO ORDERED

**VIA ECF AND E-MAIL**

The Hon. Barbara C. Moses  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

/s/ Alvin K. Hellerstein  
U.S.D.J.  
December 4, 2023

**Re: *United States v. Charlie Javice*, 23-Cr.-251 (S-1) (AKH) (BCM)**

Dear Judge Moses,

We write on behalf of our client, Charlie Javice, to request a modification to her current bail conditions. Specifically, we request that the bail condition imposing a curfew be removed and that, in lieu of curfew, Ms. Javice be subject to 24-hour location monitoring via GPS. All other conditions of release would remain in effect. We have confirmed that the Government and Pretrial Services have no objection to the requested modification.

By way of background, Ms. Javice was presented on the indictment in this matter on April 4, 2023 and was released on a secured, \$2 million personal recognizance bond later that day. Ms. Javice has been subject to a curfew, among other restrictions, for the duration of her supervised release. Ms. Javice has been fully compliant with all conditions of her bond.

We appreciate the Court's consideration of this request.

Respectfully submitted,

*/s/ Samuel P. Nitze*

Samuel P. Nitze

**quinn emanuel urquhart & sullivan, llp**

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